

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JOSE E. VEGA RAMIREZ
AGNES E. RIVERA SANCHEZ
DEBTOR(S)

CASE NUMBER: 07-04202 SEK

CHAPTER 13 ASSET CASE)

MOTION FOR RECONSIDERATION OF DISMISSAL AND REQUESTING
EXTENSION OF TIME TO REPLY TRUSTEE'S MOTION TO DISMISS AND CURE
ARREARS THROUGH A POST CONFIRMATION MODIFICATION

TO THE HONORABLE COURT:

COME(S) now Debtor(s) represented by the undersigned counsel
and respectfully allege(s) and pray(s) as follows:

1. On January 25th, 2011, Trustee filed a motion to Dismiss.
2. The Court granted the Trustee's Motion to Dismiss before
the request for extension of time was filed.
3. Debtor wishes to request the reconsideration of the
dismissal, he incurred in arrears due to the fact that he retired
and is making all arrangements to get the complete and correct
information of his finances in order to file the corresponding
amendments, the lack of income made him incur in arrears but once
he starts receiving his retirement on March 2011 he will resume his
payments, he needs and extension of time to reply said motion in
order to review all payments made to Trustee and prepare a motion
for post confirmation modification which will take care of the
issues raised by the Trustee.
4. Debtor wishes to request a period of thirty (30) days be
granted for debtor to respond to said Motion and cure arrears
though a post confirmation modification.
5. Debtor represents that the above constitutes cause for

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relief from the Judgement of dismissal pursuant to Rules 59 and 60 (b) (6) F.R. Civ. P., made applicable to case under title 11 by Rule 9024 F.R. B.P., which provide for relief from Judgement for "any reason justifying relief from the operation of the (Order)".

NOTICE: Within forty four(14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise. If you file a timely response, the court may - in its discretion - schedule a hearing.

WHEREFORE, is respectfully requested from this Honorable Court to grant the present Motion, and enter an Order vacating and setting aside the Order dated February 28th, 2011.

In San Juan, Puerto Rico, this 28th, day of February 2011.

I HEREBY CERTIFY: That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Chapter 13 Trustee **José R. Carrión, Esq.**, US Trustee **Monsita Lecaroz Arribas** and to all those who in this case have registered for receipt of notice by electronic mail and I hereby certify that I have mailed by regular mail to all creditors listed on the attached Master Address List.

RESPECTFULLY SUBMITTED

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